1 2	United States Attorney		
3	C. HAY-MIE CHO Special Assistant United States Attorney		
5	160 Spear Street, Suite 800 San Francisco, CA 94596 Telephone No.: (415) 268-5610 Facsimile No.: (415) 744-0134 Email Address: haymie.cho@ssa.gov		
6 7			
8	Attorneys for Defendant		
9 10			
11	UNITED STATES DISTRICT COURT		
12	DISTRICT OF NEVADA		
13 14	Plaintiff) (Case No. 2:16-cv-02412-GMN-GWF	
15	j j	UNOPPOSED MOTION FOR EXTENSION OF TIME	
16 17	Acting Commissioner of Social Security,	(FIRST REQUEST)	
18			
19 20	Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant")		
21	respectfully requests that the Court extend the time for Defendant to file her Answer, due on January 3,		
22	2017 by 30 days, through and including February 2, 2017.		
23	Defendant needs additional time to draft and file her answer because the United States Attorney's		
24	Office has not yet received the Certified Administrative Record (CAR). Therefore, Defendant is unable		
25	to file the CAR with her Answer. Defendant contacted Plaintiff's counsel, Marc A. Kalagian, by telephone		

26 on January 3, 2017, but was unable to reach Plaintiff's counsel, Gerald Welt. Mr. Kalagian informed

1	Defendant that he would authorize Defendant's request on Mr. Welt's behalf. This request is made in	
2	good faith with no intention to unduly delay the proceedings.	
3	Respectfully submitted this 3rd day of January, 2017.	
4	DANIEL G. BOGDEN United States Attorney	
5		
6	/s/ C. Hay-Mie Cho C. HAY-MIE CHO Stravial Assistant United States Attention	
7	Special Assistant United States Attorney	
8		
9	OF COUNSEL:	
10	DEBORAH LEE STACHEL Regional Chief Counsel, Region IX	
11		
12		
13	IT IS SO ORDERED:	
14	Leonge Folia a	
15	UNITED STATES MACISTRATE JUDGE	
16	DATED: January 4, 2017	
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CERTIFICATE OF SERVICE 1 2 I, C. Hay-Mie Cho, certify that the following individuals were served with a copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service 3 identified below: 4 **CM/ECF:** 5 Marc V. Kalagian 6 Law Offices of Rohlfing & Kalagian, LLP 211 East Ocean Boulevard, Suite 420 7 Long Beach, CA 90802 marc.kalagian@rksslaw.com 8 9 Gerald M. Welt 732 S. Sixth Street, Suite 200-D 10 Las Vegas, NV 89101 gmwesq@weltlaw.com; kwp@weltlaw.com 11 Dated this 3rd day of January, 2017. 12 13 /s/ C. Hay-Mie Cho C. HAY-MIE CHO 14 Special Assistant United States Attorney 15 16 17 18 19 20 21 22 23 24 25

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